

WWR# 08809728

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:  
LORETTA S. WILLIAMS

Debtor

CITIZENS BANK OF PENNSYLVANIA  
Movant

Case No. 09-16084-SR  
Chapter 13

**Hearing Date:** 11/10/10

**Hearing Time:** 10:00 a.m.

**MOTION OF CITIZENS BANK OF PENNSYLVANIA FOR RELIEF FROM  
AUTOMATIC STAY PURSUANT TO 11 U.S.C. SECTION 362(d)**

The Motion of Movant, by its attorney, Keri P. Claeys, respectfully represents:

1. On August 14, 2009, Debtor filed a voluntary petition commencing a case under Chapter 13, Title 11, United States Code, and for the entry of an Order for Relief.
2. Movant holds a valid security interest in the form of a Pennsylvania Closed-End Mortgage (the "Mortgage") on a certain residence owned and/or occupied by the Debtor known as 501 North Bethlehem Pike Unit 8A, Ambler, PA 19002 and as more particularly described in the Mortgage. A copy of said Mortgage showing Movant's interest is attached to this Motion as Exhibit "A".
3. This is an action under 11 U.S.C. Section 362(d) to vacate or modify a stay granted under 11 U.S.C. Section 362(a) to permit foreclosure of the Mortgage and/or a Sheriff's Sale of the subject real property.
4. At the time of the filing of this Motion, the Debtor owes Movant \$2,148.12 in monthly payments, late charges, attorney's fees and court costs on account of defaulted monthly payments due from June 26, 2010 through and including October 15, 2010.
5. The payoff balance on the account as of October 15, 2010, is \$27,741.46.
6. The Movant does not have, nor has it been offered, adequate protection for its interest in the mortgaged property.

7. If Movant is not permitted to foreclose its security interest as hereinabove set forth, it will suffer irreparable injury, loss and damage.

**WHEREFORE**, Movant prays that the stay pursuant to Section 362(a) of Title 11 United States Code be modified to allow Movant execution process through and including, but not limited to, foreclosure and/or Sheriff's Sale of the subject real property, and that it have such other relief as is just.

WELTMAN, WEINBERG & REIS CO., L.P.A.

Date: October 15, 2010

BY: /s/ Keri P. Claeys  
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